


Exhibit Q

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Manhattan D.A. could be close to charging Trump

The Manhattan District Attorney's Office has invited former President Donald Trump to testify before the grand jury investigating a "hush money" payment to an adult film star during the 2016 presidential campaign — a move that suggests Trump could face an indictment in the case, according to a source familiar with the matter.

In New York, the offer to testify often precedes an indictment. [The New York Times](#) first reported that Manhattan D.A. Alvin Bragg's office has offered Trump the chance to testify.

A spokesperson for Bragg's office declined to comment.

A Trump spokesperson said in a statement, "The Manhattan District Attorney's threat to indict President Trump is simply insane. For the past five years, the DA's office has been on a Witch Hunt, investigating every aspect of President Trump's life, and they've come up empty at every turn – and now this."

The spokesperson characterized the possibility of Trump's indictment as "a new political attack" and "a clear exoneration of President Trump in all areas."

In what appeared to be a reference to the hush money episode, the spokesperson characterized Trump as "the victim of extortion then, just as he is now."

On Wednesday, Trump's White House counselor and former campaign manager Kellyanne Conway met for at least the second time with Manhattan prosecutors. And former Trump "fixer" and lawyer Michael Cohen has [met with investigators repeatedly](#), while describing himself as central to a case focused on a \$130,000 payment made to Stephanie Clifford, an adult film star who goes by the name Stormy Daniels, in the lead-up to the 2016 election.

Trump called the matter an "old, and rebuked case which has been rejected by every prosecutor's office," in a post Thursday on his social media site.

If indicted, Trump — who is [running for president](#) against the incumbent who beat him — would be the first former president ever charged with a crime. The probe is focused on Trump's alleged role in a scheme to cover up the payment to Daniels.

Cohen has said he made the payment on Trump's behalf to secure Daniels' silence about an alleged affair. Cohen [pleaded guilty](#) to federal tax evasion and campaign finance charges in 2018 related to the payments to Daniels.

Cohen wrote in his 2020 memoir, "Disloyal," that on Oct. 27, 2016, he unsuccessfully attempted to call Trump to confirm that he had made the payment to Daniels. Conway, he said, called back and "said she'd pass along the good news."

On Monday, Trump's former director of strategic communications, Hope Hicks, was also reportedly escorted into the D.A.'s office building through the back entrance.

In Cohen's book, he describes Hicks consulting Trump's schedule in October 2016 after Cohen asked for "five minutes" with Trump — a short conversation in which he says he first began talking to Trump about the payoff. Hicks has not commented publicly about the meeting.

Trump is facing intense legal scrutiny outside of Manhattan, too. A [special grand jury](#) in Fulton County, Georgia, completed its seven-month inquiry into Trump's activities following the 2020 election, delivering to the district attorney there in January a lengthy report, the majority of which remains under wraps.

And in Washington, D.C., a [special counsel is reviewing](#) Trump's handling of sensitive government documents found at his Mar-a-Lago home and possible obstruction of efforts to retrieve them. The special counsel, Jack Smith, is also investigating efforts to interfere with the lawful transfer of power following the 2020 presidential election or the certification of the Electoral College vote held at the Capitol on January 6, 2021.

Trump has not been charged and has denied wrongdoing in connection with each of the investigations.

Fin Gomez contributed to this report.

In:

- [Donald Trump](#)